#### IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA **SAVANNAH DIVISION**

ASHLEY F. CUMMINGS,

Plaintiff, Civil Action File No. :

4:18-cv-00244-WTM-JEG

v.

**BIGNAULT & CARTER, LLC; W.** PASCHAL BIGNAULT; and LORI A. CARTER.

Defendants.

#### PLAINTIFF'S MOTION FOR **ATTORNEYS' FEES AND COSTS**

**COMES NOW** Plaintiff, Ashley F. Cummings, by and through counsel undersigned, and pursuant to this Court's April 1, 2019 Order, hereby submits Plaintiff's Motion For Attorneys' Fees and Costs in accordance with Federal Rule 54(d)(2)(B). Plaintiff seeks \$9,990.00 as a fully compensatory fee, and \$652.01 in costs to date for a total award of \$10,642.01.

The Court directed Plaintiff to provide supporting documentation regarding fees and costs by April 12, 2019. As a result of the settlement of Plaintiff's underlying claims, Plaintiff is a prevailing party entitled to an award of reasonable fees and costs pursuant to 29 U.S.C. § 216(b) ("The court in such action shall, in addition to any judgment awarded to the plaintiff or plaintiffs, allow a reasonable attorney's fee to be paid by the defendant, and costs of the action.")

WHEREFORE, Plaintiff prays that the Court enter judgment for Plaintiff and against Defendants for her fees and costs as set forth above, and as indicated in Plaintiff's Specification And Itemization In Support Of Motion For Attorneys' Fees And Costs, filed concurrently herewith.

Respectfully submitted this 12<sup>th</sup> day of April 2019.

#### PANKEY & HORLOCK, LLC

By: /s/ Larry A. Pankey .

Georgia Bar No. 560725

Attorneys for Plaintiff

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\_\_\_\_\_**:** 

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed **Plaintiff's Motion For Attorneys' Fees And Costs** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Charles Herman
Charles Herman Law
Charles@CharlesHermanLaw.com
Attorneys for Defendants

Dated this 12<sup>th</sup> day of April 2019.

# PANKEY & HORLOCK, LLC

By: /s/ Larry A. Pankey

Georgia Bar No. 560725

Attorneys for Plaintiff

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